

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

ECHOLOGICS, LLC, MUELLER	)	
INTERNATIONAL, LLC and MUELLER	)	
CANADA, LTD. d/b/a ECHOLOGICS,	)	
	)	C.A. No. 19-2036-RGA
Plaintiffs,	)	
	)	<b>JURY TRIAL DEMANDED</b>
v.	)	
	)	
ORBIS INTELLIGENT SYSTEMS, INC.	)	
and AQUAM USA, INC.,	)	
	)	
Defendants.	)	

**DECLARATION OF DANNY KRYWYJ IN SUPPORT OF  
ORBIS INTELLIGENT SYSTEMS, INC.’S MOTION TO REDACT  
TRANSCRIPT OF THE JULY 29, 2020 DISCOVERY DISPUTE HEARING**

1. I, Danny Krywyj, hereby submit this Declaration in Support of Orbis Intelligent Systems, Inc.’s Motion to Redact Transcript of the July 29, 2020 Discovery Dispute Hearing. The facts herein are true and correct to the best of my current personal knowledge and information.

2. I am the Founder and President of Orbis Intelligent Systems, Inc. (“Orbis”) since September 2017. I have direct knowledge and understanding of the sales information described in the transcript of the July 29, 2020 discovery dispute hearing.

3. Orbis designs and sells innovative and patented sensors and technology to detect leaks, monitor for pipe deterioration, measure water flow, and provide tampering alerts in water systems in a noninvasive manner. Orbis recently introduced the SmartCap™ for fire hydrants, which contains this innovative technology. Orbis is a new market entrant in the market for smart fire hydrants and competes directly with Plaintiffs, which has an established presence.

4. The information contained in page 3, line 19 of the transcript of the July 29, 2020 discovery dispute hearing (Exhibit A) is commercially-sensitive information regarding Orbis Intelligent Systems, Inc.’s sales. Sales information relates directly to Orbis’ profits and working

capital which could be used by competitors to disadvantage Orbis in the marketplace. Given that Orbis is a new market entrant, public disclosure of sales information could impact both Orbis' customer and investor relationships.

5. Orbis keeps the confidential information regarding finances and sales volume secure and confidential in the ordinary course of business. The sales and finance information is maintained by Orbis on secured servers, in secured offices, and has always been protected from public disclosure or disclosure to any third parties.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this the 26 day of August, 2020.

A handwritten signature in purple ink, appearing to read 'Dany Krywyj', is written over a horizontal line.

Dany Krywyj